

**PART 70 OPERATING PERMIT
and
ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Borg Warner Automotive Diversified Transmission Products Corp.
5401 Kilgore Ave.
Muncie, Indiana 47302**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T035-7410-00020	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary automobile transfer cases manufacturing plant.

Responsible Official: Timothy M. Manganello, Plant Manager
Source Address: 5401 Kilgore Ave., Muncie, Indiana, 47304
Mailing Address: 5401 Kilgore Ave., Muncie, Indiana, 47304
SIC Code: 3714
County Location: Delaware County
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) Three (3) 68.75 million Btu per hour boilers, identified as Boiler 2, Boiler 3 and Boiler 4, using natural gas, No. 6 residual oil and No. 2 distillate oil, for fuel, with no control, and Boiler 2 exhausting to stack 79 and Boilers 3 and 4 exhausting to stack 80.
- (2) One (1) Diesel fueled internal combustion engine-driven test cell, with a capacity of 400 Horsepower, identified as Dynos-2, and exhausting to stack 192.
- (3) Three (3) gasoline fueled internal combustion engine-driven test cells, with a combined capacity of 963 Horsepower, identified together as Dynos-1, and exhausting to stacks 194 and 202.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);

SECTION B

GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or for
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision;
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

- (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or noncompliance.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or

(C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.13 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.15 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
[326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

- (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.21 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner (or local agency) makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.24 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) Three (3) 68.75 million Btu per hour boilers, identified as Boiler 2, Boiler 3 and Boiler 4, using natural gas, No. 6 residual oil and No. 2 distillate oil, for fuel, with no control, and Boiler 2 exhausting to stack 79 and Boilers 3 and 4 exhausting to stack 80.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from the three (3) 68.75 MMBtu per hour boilers shall not exceed:

- (a) One and six-tenths (1.6) pounds per MMBtu heat input when using No. 6 residual oil for fuel; and

- (b) Five-tenths (0.5) pounds per MMBtu heat input when using No. 2 distillate oil for fuel.

D.1.2 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Emissions Limitations for sources of Indirect Heating), the PM emissions from Boilers 2, 3 and 4, shall be limited to 0.295 pounds per million Btu.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Compliance stack tests shall be performed within 180 days of issuance of this permit, for PM from boilers 3 and 4 at stack 80. These test shall be performed according to Section C - Performance Testing, using 40 CFR 60, Appendix A, Methods 5 or 17 (as appropriate) or other methods approved by OAM. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.1.4 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur content does not exceed 1.52 percent by weight for No. 6 fuel oil and 0.5 percent by weight for No. 2 fuel oil by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a certification;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the three (3) 68.75 MMBtu per hour boilers, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the boiler stack exhausts shall be performed during normal daylight operations when any boiler is combusting No. 6 or No. 2 fuel oil when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

 - (4) Fuel supplier certifications.
 - (5) The name of the fuel supplier; and
 - (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emissions notations when combusting No. 6 or No. 2 fuel oil in any boiler.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 in any compliance period when No. 6 or No. 2 fuel oil was combusted, and the natural gas boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (2) One (1) Diesel fueled internal combustion engine-driven test cell, with a capacity of 400 Horsepower, identified as Dynos-2, and exhausting to stack 192.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP-035-7542-00020, issued on May 29, 1997, this facility shall be limited to 10,752 gallons of diesel oil per month used for fuel in the test cell. This usage limit is equivalent to 3.25 tons per month of NOx emissions. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the NOx limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Visible Emissions Notations

- (a) Weekly visible emission notations of the Dynos-2 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 and D.2.4, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) and (2)

shall be taken monthly and shall be complete and sufficient to establish compliance with the diesel fuel throughput limit established in Condition D.3.1.

- (1) The amount of diesel fuel used;
 - (2) A log of the dates of use;
 - (3) Visible emission notations.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (3) Three (3) gasoline fueled internal combustion engine-driven test cells, with a combined capacity of 963 Horsepower, identified together as Dynos-1, and exhausting to stacks 194 and 202.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.3 Visible Emissions Notations

- (a) Weekly visible emission notations of the Dynos-1 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.4 Record Keeping Requirements

- (a) To document compliance with Condition D.3.3, the Permittee shall maintain records of weekly visible emission notations.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.5 Reporting Requirements

A summary of the information to document compliance with Condition D.3.3 shall be submitted to the address listed in Section C - General Reporting Requirements, upon request.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Insignificant Activities:

- (1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOCs) [326 IAC 8-3]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination Requirements

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.3 Record Keeping and Reporting Requirements

There are no record keeping or reporting requirements for these insignificant degreasers.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Borg Warner Automotive Diversified Transmission Products Corp.
Source Address: 5401 Kilgore Ave, Muncie, Indiana 47302
Mailing Address: 5401 Kilgore Ave, Muncie, Indiana 47302
Part 70 Permit No.: T035-7410-00020

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Borg Warner Automotive Diversified Transmission Products Corp.
Source Address: 5401 Kilgore Ave, Muncie, Indiana 47302
Mailing Address: 5401 Kilgore Ave, Muncie, Indiana 47302
Part 70 Permit No.: T035-7410-00020

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Borg Warner Automotive Diversified Transmission Products Corp.
Source Address: 5401 Kilgore Ave, Muncie, Indiana 47302
Mailing Address: 5401 Kilgore Ave, Muncie, Indiana 47302
Part 70 Permit No.: T035-7410-00020

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

<u>Boiler Affected</u>	<u>Alternate Fuel</u>	<u>Days burning alternate fuel</u>	
		<u>From</u>	<u>To</u>
Boiler 2	No. 6 fuel oil		
Boiler 2	No. 2 fuel oil		
Boiler 3	No. 6 fuel oil		
Boiler 3	No. 2 fuel oil		
Boiler 4	No. 6 fuel oil		
Boiler 4	No. 2 fuel oil		

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Borg Warner Automotive Diversified Transmission Products Corp.
Source Address: 5401 Kilgore Ave, Muncie, Indiana 47302
Mailing Address: 5401 Kilgore Ave, Muncie, Indiana 47302
Part 70 Permit No.: T035-7410-00020
Facility: Boiler 2
Parameter: Average sulfur content of No. 6 and No. 2 fuel oil burned, average heating value of No. 6 and No. 2 fuel oil burned, equivalent Sulfur dioxide emissions.
Limit: No. 6 - 1.52% Sulfur and Sulfur dioxide emissions of 1.6 lb/MMBtu heat input
No. 2 - 0.5% Sulfur and Sulfur dioxide emissions of 0.5 lb/MMBtu heat input

YEAR: _____

Month	Fuel	Average Sulfur Content of fuel oil (%)	Average Heating Value of fuel oil (MMBtu/gallon)	Equivalent Sulfur Dioxide Emissions (lb/MMBtu)
Month 1	No. 2 fuel oil			
	No. 6 fuel oil			
Month 2	No. 2 fuel oil			
	No. 6 fuel oil			
Month 3	No. 2 fuel oil			
	No. 6 fuel oil			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Borg Warner Automotive Diversified Transmission Products Corp.
Source Address: 5401 Kilgore Ave, Muncie, Indiana 47302
Mailing Address: 5401 Kilgore Ave, Muncie, Indiana 47302
Part 70 Permit No.: T035-7410-00020
Facility: Boiler 3
Parameter: Average sulfur content of No. 6 and No. 2 fuel oil burned, average heating value of No. 6 and No. 2 fuel oil burned, equivalent Sulfur dioxide emissions.
Limit: No. 6 - 1.52% Sulfur and Sulfur dioxide emissions of 1.6 lb/MMBtu heat input
No. 2 - 0.5% Sulfur and Sulfur dioxide emissions of 0.5 lb/MMBtu heat input

YEAR: _____

Month	Fuel	Average Sulfur Content of fuel oil (%)	Average Heating Value of fuel oil (MMBtu/gallon)	Equivalent Sulfur Dioxide Emissions (lb/MMBtu)
Month 1	No. 2 fuel oil			
	No. 6 fuel oil			
Month 2	No. 2 fuel oil			
	No. 6 fuel oil			
Month 3	No. 2 fuel oil			
	No. 6 fuel oil			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Borg Warner Automotive Diversified Transmission Products Corp.
Source Address: 5401 Kilgore Ave, Muncie, Indiana 47302
Mailing Address: 5401 Kilgore Ave, Muncie, Indiana 47302
Part 70 Permit No.: T035-7410-00020
Facility: Boiler 4
Parameter: Average sulfur content of No. 6 and No. 2 fuel oil burned, average heating value of No. 6 and No. 2 fuel oil burned, equivalent Sulfur dioxide emissions.
Limit: No. 6 - 1.52% Sulfur and Sulfur dioxide emissions of 1.6 lb/MMBtu heat input
No. 2 - 0.5% Sulfur and Sulfur dioxide emissions of 0.5 lb/MMBtu heat input

YEAR: _____

Month	Fuel	Average Sulfur Content of fuel oil (%)	Average Heating Value of fuel oil (MMBtu/gallon)	Equivalent Sulfur Dioxide Emissions (lb/MMBtu)
Month 1	No. 2 fuel oil			
	No. 6 fuel oil			
Month 2	No. 2 fuel oil			
	No. 6 fuel oil			
Month 3	No. 2 fuel oil			
	No. 6 fuel oil			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Borg Warner Automotive Diversified Transmission Products Corp.
Source Address: 5401 Kilgore Ave, Muncie, Indiana 47302
Mailing Address: 5401 Kilgore Ave, Muncie, Indiana 47302
Part 70 Permit No.: T035-7410-00020
Facility: Dynos-2
Parameter: diesel fuel throughput
Limit: 10,752 gallons of diesel fuel per month, equivalent NOx emissions of 3.25 tons per month.

YEAR: _____

Month	Diesel fuel combusted this month (gallons)	Equivalent NOx emissions (tons/month)
Month 1		
Month 2		
Month 3		

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE REPORT**

Source Name: Borg Warner Automotive Diversified Transmission Products Corp.
Source Address: 5401 Kilgore Ave, Muncie, Indiana 47302
Mailing Address: 5401 Kilgore Ave, Muncie, Indiana 47302
Part 70 Permit No.: T035-7410-00020

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Management**

**Technical Support Document (TSD) for a Part 70 Operating Permit and
Enhanced New Source Review**

Source Background and Description

Source Name:	Borg Warner Automotive Diversified Transmission Products Corp.
Source Location:	5401 Kilgore Ave., Muncie, Indiana 47302
County:	Delaware
SIC Code:	3714
Operation Permit No.:	T035-7410-00020
Permit Reviewer:	Dana L. Brown

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Borg Warner Automotive Diversified Transmission Products Corp., relating to the operation of an automobile transmission manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) Three (3) 60.625 million Btu per hour boilers, identified as Boiler 2, Boiler 3 and Boiler 4, using natural gas and No. 6 residual oil for fuel, with no control, and Boiler 2 exhausting to stack 79 and Boilers 3 and 4 exhausting to stack 80.

Note: There is no boiler identified as Boiler 1.

- (2) One (1) Pangborn mechanical blaster, identified as AC-2, with a blast rate of 2,750 pounds per hour of steel shot, with particulate emissions controlled by a rotocyclone, and exhausting to stack 37/1.
- (3) One (1) Diesel fired internal combustion engine-driven test cell, with a capacity of 400 Horsepower, identified as Dynos-2, and exhausting to stack 192.

Unpermitted Emission Units and Pollution Control Equipment Under ENSR

The source also consists of the following unpermitted facilities/units to be evaluated under Enhanced New Source Review (ENSR):

- (1) Three (3) gasoline fired internal combustion engine-driven test cells, with a combined capacity of 963 Horsepower, identified together as Dynos-1, and exhausting to stacks 194 and 202.
- (2) Three (3) mechanical blasters, T1181, T1182 and T1225, identified together as AC-1, with a blast rates of 42,000, 36,000 and 42,000 pounds per hour of steel shot, respectively, with particulate emissions controlled by a baghouse, and exhausting to stacks I, J and K.

New Emission Units and Pollution Control Equipment Under ENSR

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. Sixteen (16) heat treat furnaces of the following types, identified together as HT:
 - (a) Five (5) natural gas-fired, batch carburizer furnaces, each with a heating capacity of 2,750 cubic feet per hour, and exhausting to stacks 56, 63, 68, 76, and 47;
 - (b) Ten (10) natural gas-fired, all case furnaces, four (4) with heating capacities of 2,500 cubic feet per hour, four (4) with heating capacities of 2,600 cubic feet per hour, and two (2) with heating capacities of 2,380 cubic feet per hour, and exhausting to stacks 23 (2 furnaces), 4 (2 furnaces), 1, 30 (3 furnaces), and 38 (2 furnaces); and
 - (c) One (1) electric, all case furnace, exhausting to stack 3.
- (2) Combustion source flame safety purging on startup.
- (3) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (4) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (5) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (6) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (7) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (8) Cleaners and solvents characterized as having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100EF) or, having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (9) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (10) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.
- (11) Noncontact cooling tower systems with forced and induced draft cooling tower system not regulated under a NESHAP.
- (12) Quenching operations used with heat treating processes.
- (13) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

- (14) Heat exchanger cleaning and repair.
- (15) Paved and unpaved roads and parking lots with public access.
- (16) Asbestos abatement projects regulated by 326 IAC 14-10.
- (17) Purging of gas lines and vessels that is related to routing maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (18) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (19) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (20) On-site fire and emergency response training approved by the department.
- (21) Stationary fire pumps.
- (22) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (23) Filter or coalescer media changeout.
- (24) A laboratory as defined in 326 IAC 2-7(20)(c).

Existing Approvals

The source has been operating under the following approvals:

- (1) OP 18-01-91-0248, issued on May 27, 1987; and
- (2) CP 035-7542-00020, issued on May 29, 1997.

Air Pollution Control Justification as Integral Part of the Process

The company has submitted the following justification such that the combustion of carbon monoxide is inherent to the heat treating process and should not be considered as control equipment:

- (1) Carbon monoxide has an auto-ignition temperature of 1128°F and an upper flammable limit of 74%, so combustion of carbon monoxide discharged from the heat treating process is unavoidable. Heat treatment furnaces often use a "flame screen" at entrances and exits to keep free oxygen out of the furnaces, and this feature provides a potential ignition source for exhausted atmosphere gas.

IDEM, OAM has evaluated the justifications and agreed that the combustion of carbon monoxide from the heat treating process will be considered as an integral part of the heat treating process. Therefore, the permitting level will be determined using the potential emissions after the combustion of carbon monoxide. Operating conditions will be specified in the proposed permit that this combustion of carbon monoxide will occur at all times when the heat treating process is in operation.

Enforcement Issue

- (a) IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:
- (1) Three (3) gasoline fired internal combustion engine-driven test cells, with a combined capacity of 963 Horsepower, identified together as Dynos-1, and exhausting to stacks 194 and 202.
 - (2) Three (3) mechanical blasters, T1181, T1182 and T1225, identified together as AC-1, with a blast rates of 42,000, 36,000 and 42,000 pounds per hour of steel shot, respectively, with particulate emissions controlled by a baghouse, and exhausting to stacks I, J and K.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 9, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations. (9 pages)

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	greater than 250
PM-10	greater than 250
SO ₂	greater than 250
VOC	greater than 100, less than 250
CO	greater than 250
NO _x	greater than 250

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
TOTAL	--

- (a) The potential emissions (as defined in the Indiana Rule) of all criteria pollutants are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) **Fugitive Emissions**
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1995 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	3.221
PM-10	2.502
SO ₂	0.217
VOC	74.920
CO	73.253
HAP (specify)	--
NO _x	28.284

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units.

	Limited Potential to Emit (tons/year)					
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x
Boilers 2, 3, and 4, Dynos-1	Existing Major Source					
Mechanical Blaster, AC-1, #T1181	24.0	14.0				
Mechanical Blaster, AC-1, #T1182						
Mechanical Blaster, AC-1, #T1225	24.0	14.0				
Mechanical Blaster, AC-2	24.0	14.0				
Dynos-2	3.8	3.8	3.6	4.4	11.7	39.0

Attached Tables 1 to 5 summarize the permit conditions and requirements.

County Attainment Status

The source is located in Delaware County.

Pollutant	Status (attainment or unclassifiable/ severe, moderate, marginal, or maintenance nonattainment)
TSP	Attainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Delaware County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) The three (3) 60.625 MMBtu per hour boilers, constructed in 1961, 1969 and 1969, are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because the dates of construction were prior to the June 9, 1989 applicability date of the NSPS.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

- (a) This source was in existence prior to the August 7, 1977 applicability date of this rule, therefore the original source was not required to undergo PSD review, and has been considered an existing major source.
- (b) The potential emissions of the all case furnaces installed in 1979 and in 1980 are less than the major PSD modification levels to the existing major source, so these facilities have not been limited out of PSD.
- (c) The combined PM emissions from AC-1, #T1181 and #T1182, installed in 1986 shall be considered a minor modification to a major PSD source. In order to qualify for this status, and because PM-10 is considered to be 86% of PM, these facilities are limited to combined PM emissions of 3.71 pounds per hour, (equivalent to 16.28 tons per year) of PM emissions and combined PM-10 emissions of 3.19 pounds per hour (equivalent to 14 tons per year). In order to comply with these limits, AC-1 #T1181 shall be limited to 1.95 pounds per hour (equivalent to 8.54 tons per year) of PM emissions, and AC-1, #T1182 shall be limited to 1.76 pounds per hour (equivalent to 7.70 tons per year) of PM emissions, according to 326 IAC 6-3 (Process Operations).

These facilities are limited to a combined PM-10 emission limit of 3.19 pounds per hour, which is equivalent to 14 tons per year of PM-10 emissions. The individual facility limits are as follows:

For AC-1, #T1181: $1.95 \text{ lb/hr} \times 86\% = 1.67 \text{ lb/hr}$

For AC-1, #T1182: $1.76 \text{ lb/hr} \times 86\% = 1.51 \text{ lb/hr}$

Both of these facilities shall be required to use their respective baghouses for control, when in operation, in order to comply with these limits.

- (d) The PM emissions from AC-1, #T1225, installed in 1988, shall be considered a minor modification to a major PSD source. In order to qualify for this status, and because PM-10 is considered to be 86% of PM, the facility is limited to 3.71 pounds per hour (equivalent to 16.28 tons per year) of PM emissions by 326 IAC 6-3 (Process Operations) and shall be limited to PM-10 emissions of 3.19 pounds per hour (equivalent to 14 tons per year). This facility shall use the baghouse for control, when in operation, in order to comply with these limits.
- (e) Because PM-10 emissions are limited to below 15 tons per year for a minor modification to a major PSD source, and PM-10 is considered to be 86% of PM, the PM emissions from AC-2, installed in 1987, shall be limited to 3.71 pounds per hour (equivalent to 16.28 tons per year) by requirements of 326 IAC 6-3 (Process Operations). PM-10 emissions from this facility shall be limited to 3.19 pounds per hour (equivalent to 14 tons per year). This facility shall use a rotocyclone for control, when in operation, in order to comply with these limits and be considered a minor modification to a major PSD source.
- (f) The NO_x emissions from the Dynos-2 test engine, installed in 1997, has been limited by CP 035-00020 to 3.25 tons per month (equivalent to 39 tons per year) in order to be considered a minor modification of a major PSD source. In order to comply with this limit, the diesel oil used as fuel in the test cell shall be limited to 10,752 gallons per month.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of all criteria pollutants. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-2: Particulate Emissions Limitations

The three 60.625 MMBtu per hour boilers at the source were installed in the 1960's, therefore they are subject to the limits in 326 IAC 6-2-3. Particulate emissions from all facilities used for indirect heating purposes which were existing and in operation before September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{C \cdot a \cdot h}{76.5 \cdot Q^{0.75} \cdot N^{0.25}}$$

$$= 0.118 \text{ lb / mmBtu}$$

Where: Pt = allowable PM emissions, lb/mmBtu
C = 50 Fg/m³
a = plume rise factor = 0.67
h = stack height, ft = 16
N = number of stacks = 2
Q = total heat input capacity = 181.875 mmBtu/hr

This limit shall in no case exceed 0.8 pounds per million Btu, pursuant to 326 IAC 6-2-3(d).

With natural gas or No. 6 fuel oil as fuel in each of the 60.625 MMBtu per hour boilers, the potential emissions are:

$$\frac{20.2 \text{ ton}}{\text{yr}} \times \frac{1 \text{ yr}}{8760 \text{ hr}} \times \frac{1 \text{ hr}}{60.625 \text{ mmBtu}} \times \frac{2000 \text{ lb}}{1 \text{ ton}} = \frac{0.076 \text{ lb}}{\text{MMBtu}} < 0.118 \text{ lb/mmBtu}$$

so the boilers, are in compliance with this rule.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) emissions from the mechanical blasters, AC-1 and AC-2, shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and}$$

$$P = \text{process weight rate in tons per hour}$$

1. For AC-1, #T1181, P = 21 tons per hour, therefore:

$$E = 4.10 (7.689) = 31.52 \text{ lb/hr}$$

For AC-1, #T1182, P = 18 tons per hour, therefore:

$$E = 4.10 (6.934) = 28.43 \text{ lb/hr}$$

These two CWOP/OWOP facilities were built in 1986 and shall be considered as a minor modification to a major PSD source. Because PM-10 emissions are limited to below 15 tons per year for a minor modification to a major PSD source, and PM-10 is considered to be 86% of PM, these facilities are limited to combined PM emissions of 3.71 pounds per hour, which is equivalent to 16.28 tons per year of PM emissions. The individual facility limits are as follows:

$$\text{For AC-1, \#T1181: } \frac{31.52 \text{ lb/hr}}{59.95 \text{ lb/hr}} \times 3.71 \text{ lb/hr} = 1.95 \text{ lb/hr}$$

$$\text{For AC-1, \#T1182: } \frac{28.43 \text{ lb/hr}}{59.95 \text{ lb/hr}} \times 3.71 \text{ lb/hr} = 1.76 \text{ lb/hr}$$

PM emissions for AC-1, #T1181, after control are 168 lb/hr x (1-99%) = 1.68 lb/hr;

PM emissions for AC-1, #T1182, after control are 144 lb/hr x (1-99%) = 1.44 lb/hr;

Therefore, both of these facilities are in compliance with this rule.

2. For AC-1, #T1225, P = 21 tons per hour, therefore:

$$E = 4.10 (7.689) = 31.52 \text{ lb/hr}$$

This CWOP/OWOP facility was built in 1988, and shall be considered as a minor modification to a major PSD source. Because PM-10 emissions are limited to below 15 tons per year for a minor modification to a major PSD source, and PM-10 is considered to be 86% of PM, this facility is limited to PM emissions of 3.71 pounds per hour, which is equivalent to 16.28 tons per year of PM emissions.

PM emissions for AC-1, #T1225, after control are $168 \text{ lb/hr} \times (1-99\%) = 1.68 \text{ lb/hr}$;

Therefore, this facility is in compliance with this rule.

3. For AC-2, $P = 1.375$ tons per hour, therefore:

$$E = 4.10 (1.23) = 5.07 \text{ lb/hr}$$

Because PM-10 emissions are limited to below 15 tons per year for a minor modification to a major PSD source, and PM-10 is considered to be 86% of PM, this facility is limited to PM emissions of 3.71 pounds per hour, which is equivalent to 16.28 tons per year of PM emissions.

PM emissions for AC-2, after control are $11 \text{ lb/hr} \times (1-96\%) = 0.44 \text{ lb/hr}$, therefore this facility is in compliance with this rule.

326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)

Pursuant to this rule, the residual oil combusted in the three (3) 60.625 MMBtu per hour boilers shall not exceed one and six-tenths (1.6) pounds per million Btu of Sulfur dioxide emissions. Based on a heating value of 150,000 Btu per gallon of residual oil, the fuel oil sulfur content shall be limited to 0.49 percent (%) Sulfur.

$$\frac{1.6 \text{ lb}}{\text{MMBtu}} = \frac{157S \text{ lb}}{\text{kgal}} \times \frac{1 \text{ kgal}}{1000\text{gal}} \times \frac{1 \text{ gallon}}{0.15 \text{ MMBtu}}$$

$$S = 1.52 \%$$

Based on the information submitted, the boilers use residual oil with a maximum of 0.8% Sulfur. Therefore, the boilers are in compliance with this rule.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The boilers, 2, 3 and 4, have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the blasters stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

This monitoring condition is necessary to show compliance with 326 IAC 6-2 (Particulate Matter Limitations).

2. The mechanical blasters, AC-1 and AC-2 have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the blasters stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
 - (b) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with AC-1, #T1181, T1182, and T1225, and the rotocyclone used in conjunction with AC-2, at least once daily when the mechanical blasting processes are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 3.0 and 7.0 inches of water and the pressure drop across the rotocyclone shall be maintained within the range of 4.0 to 6.0 inches of water, or at ranges established during the latest stack test. The Preventive Maintenance Plan for these units shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.
 - (c) In the event that bag failure has been observed the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

These monitoring conditions are necessary because the baghouses and rotocyclone for the mechanical blasters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations).

3. The diesel test engine, Dynos-2 and the gasoline test engines, Dynos-1 have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the test engine stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

This monitoring condition is necessary as a surrogate of compliance with 326 IAC 5-1 (Opacity).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

None of these listed air toxics will be emitted from this source.

Conclusion

The operation of this automobile transmission manufacturing plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T035-7410-00020**.

Description of facility: Natural gas and No. 6 fuel oil-fired Boilers 2, 3 and 4
Max Rating: 60.625 MMBtu per hour
Construction Date: 1961, 1969, 1969
Control Device (if any): none
Stack/Vent ID: 79, 80, 80

Table 1

EMISSION LIMITATIONS		
Numerical Emission Limit:	1.6 lb/MMBtu	0.118 lb / mmBtu
Regulation/Citation:	326 IAC 7-1.1-1	326 IAC 6-2
Compliance Demonstration:	Record keeping and reporting of sulfur content of fuel	"normal" emissions
PERFORMANCE TESTING		
Parameter/Pollutant to be Tested:	NA	NA
Testing Method/Analysis:	NA	NA
Testing Frequency/Schedule:	NA	NA
Submittal of Test Results:	NA	NA
COMPLIANCE MONITORING		
Monitoring Description:	NA	daily visible emission notations
Monitoring Method:	NA	"normal" or "abnormal"
Monitoring Regulation/Citation:	NA	NA
Monitoring Frequency:	NA	daily
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Calendar dates covered in the compliance determination period; Actual usage since last compliance determination period and value calculated per limitation; A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and Fuel supplier certifications. The fuel supplier certification shall contain, as a minimum, the following: the name of the fuel supplier; and a statement from the fuel supplier that certifies the sulfur content of the fuel oil.	daily visible emission notations
Recording Frequency:	with each delivery of fuel oil	daily
REPORTING REQUIREMENTS		
Information in Report:	natural gas boiler certification, sulfur content of fuel oil, heating value of fuel oil, equivalent SO ₂ emissions.	daily visible emission notations
Reporting Frequency/Submittal:	quarterly	upon request
Additional Comments:		

Description of facility: Mechanical Blasters, AC-1 (T1181, T1182, T1225) and AC-2
Max Rating: 42,000; 36,000; 42,000; and 2,750 pounds per hour of steel shot
Construction Date: 1986, 1986, 1988, and 1987
Control Device (if any): baghouse for AC-1, cyclone for AC-2
Stack/Vent ID: I, J, K, 37/1

Table 2

EMISSION LIMITATIONS		
Numerical Emission Limit:	AC-1 #T1181, 2.87 lb/hr ; AC-1 #T1182, 2.59 lb/hr; AC-1 #T1225, 5.47 lb/hr; AC-2, 5.07 lb/hr.	
Regulation/Citation:	326 IAC 6-3	
Compliance Demonstration:	Use of baghouse and rotocyclone for particulate matter control	
PERFORMANCE TESTING		
Parameter/Pollutant to be Tested:	NA	
Testing Method/Analysis:	NA	
Testing Frequency/Schedule:	NA	
Submittal of Test Results:	NA	
COMPLIANCE MONITORING		
Monitoring Description:	daily visible emission notations, static pressure drop across baghouse and rotocyclone	
Monitoring Method:	"normal" or "abnormal", pressure gauge	
Monitoring Regulation/Citation:	NA	
Monitoring Frequency:	daily	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	daily visible emission notations, inlet and outlet differential static pressure, and cleaning cycle frequency and differential pressure	
Recording Frequency:	with each delivery of fuel oil	
REPORTING REQUIREMENTS		
Information in Report:	natural gas boiler certification, sulfur content of fuel oil, heating value of fuel oil, equivalent SO ₂ emissions.	
Reporting Frequency/Submittal:	upon request	
Additional Comments:		

Description of facility: Diesel fired internal combustion engine-driven test cell, Dynos-2
Max Rating: 400 Horsepower
Construction Date: 1997
Control Device (if any):
Stack/Vent ID: 192

Table 3

EMISSION LIMITATIONS		
Numerical Emission Limit:	3.25 tons of NOx emission per month	
Regulation/Citation:	326 IAC 2-2, 326 IAC 5-1	
Compliance Demonstration:	throughput limit of 10,752 gallons of diesel oil per month	
PERFORMANCE TESTING		
Parameter/Pollutant to be Tested:	NA	
Testing Method/Analysis:	NA	
Testing Frequency/Schedule:	NA	
Submittal of Test Results:	NA	
COMPLIANCE MONITORING		
Monitoring Description:	weekly visible emission notations	
Monitoring Method:	"normal" or "abnormal"	
Monitoring Regulation/Citation:	NA	
Monitoring Frequency:	weekly	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	weekly visible emission notations, amount of diesel fuel used, log of dates of use	
Recording Frequency:	weekly, monthly	
REPORTING REQUIREMENTS		
Information in Report:	amount of diesel fuel used, equivalent NOx emissions.	
Reporting Frequency/Submittal:	quarterly	
Additional Comments:		

Description of facility: three (3) gasoline fired internal combustion engine-driven test cells, Dynos-1
Max Rating: 963 Horsepower combined
Construction Date: 1969, 1969, 1955
Control Device (if any):
Stack/Vent ID: 194, 194 and 202

Table 4

EMISSION LIMITATIONS		
Numerical Emission Limit:	NA	
Regulation/Citation:	326 IAC 5-1	
Compliance Demonstration:	"normal" emissions	
PERFORMANCE TESTING		
Parameter/Pollutant to be Tested:	NA	
Testing Method/Analysis:	NA	
Testing Frequency/Schedule:	NA	
Submittal of Test Results:	NA	
COMPLIANCE MONITORING		
Monitoring Description:	weekly visible emission notations	
Monitoring Method:	"normal" or "abnormal"	
Monitoring Regulation/Citation:	NA	
Monitoring Frequency:	weekly	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	weekly visible emission notations	
Recording Frequency:	weekly	
REPORTING REQUIREMENTS		
Information in Report:	visible emission notations	
Reporting Frequency/Submittal:	upon request	
Additional Comments:		

Description of facility: Insignificant activities - Degreasers

Table 5

EMISSION LIMITATIONS		
Numerical Emission Limit:	15 lb/day of VOC emissions and 145 gallons of solvent per twelve month rolling total	
Regulation/Citation:	326 IAC 8-3	
Compliance Demonstration:	record keeping	
PERFORMANCE TESTING		
Parameter/Pollutant to be Tested:	NA	
Testing Method/Analysis:	NA	
Testing Frequency/Schedule:	NA	
Submittal of Test Results:	NA	
COMPLIANCE MONITORING		
Monitoring Description:	NA	
Monitoring Method:	NA	
Monitoring Regulation/Citation:	NA	
Monitoring Frequency:	NA	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	amount and VOC content of each degreasing solvent used including purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used; log of the dates of use; total VOC usage for each month; and weight of VOC emitted for each compliance period.	
Recording Frequency:	monthly	
REPORTING REQUIREMENTS		
Information in Report:	amount and VOC content of each degreasing solvent used including purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used; log of the dates of use; total VOC usage for each month; and weight of VOC emitted for each compliance period.	
Reporting Frequency/Submittal:	upon request	
Additional Comments:		

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Name:	Borg Warner Automotive Diversified Transmission Products Corp.
Source Location:	5401 Kilgore Ave., Muncie, Indiana 47302
County:	Delaware
SIC Code:	3714
Operation Permit No.:	T035-7410-00020
Permit Reviewer:	Catherine Moore

On July 16, 1997, the Office of Air Management (OAM) had a notice published in The Muncie Star Press, Muncie, Indiana, stating that Borg Warner Automotive Diversified Transmission Products Corp. had applied for a Part 70 Operating Permit to operate an automobile transmission manufacturing plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the draft permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as drafted.

On August 13, 1997, ERM, consultant for Borg Warner Automotive, submitted comments on the draft Part 70 permit. The summary of the comments is as follows (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

Comment 1:

The capacity of the three boilers, as reported in the permit application, was incorrect and should be listed as 68.75 MMBtu per hour heat input with an average stack height of 43.7 feet. No. 2 distillate oil should also be added as a fuel source for the boilers.

Response to Comment 1:

The following changes have been made to reflect new boiler information due to incorrect information stated in the Part 70 Permit application:

1. The description of the three boilers in Section A.2, Section D.1, and the TSD has been changed to be as follows:
 - (1) Three (3) ~~60-625~~ **68.75** million Btu per hour boilers, identified as Boiler 2, Boiler 3 and Boiler 4, using natural gas and No. 6 residual oil **and No. 2 distillate oil** for fuel, with no control, and Boiler 2 exhausting to stack 79 and Boilers 3 and 4 exhausting to stack 80.

There is no change in the Title V status due to this capacity change. The Technical Support Document (TSD) should also reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

2. Condition D.1.1 has been changed to be as follows:

D.1.1 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from the three (3) ~~60.625~~ **68.75** MMBtu per hour boilers shall not exceed one and six-tenths (1.6) pounds per MMBtu heat input when using No. 6 residual oil for fuel, **and five-tenths (0.5) pounds per MMBtu heat input when using No. 2 distillate oil for fuel.**

3. TSD support information for Condition D.1.1 should be as follows:

326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)

- (a) Pursuant to this rule, the residual oil combusted in the three (3) 68.75 MMBtu per hour boilers shall not exceed one and six-tenths (1.6) pounds per million Btu of Sulfur dioxide emissions. Based on a heating value of 150,000 Btu per gallon of residual oil, the fuel oil sulfur content shall be limited to 1.52 percent (%) Sulfur.

$$\frac{1.6 \text{ lb}}{\text{MMBtu}} = \frac{157 \text{ S lb}}{\text{kgal}} \times \frac{1 \text{ kgal}}{1000 \text{ gal}} \times \frac{1 \text{ gallon}}{0.15 \text{ MMBtu}} \quad S = 1.52\%$$

Based on the information submitted, the boilers use residual oil with a maximum of 0.8% Sulfur. Therefore, the boilers are in compliance with this rule.

- (b) Pursuant to this rule, the distillate oil combusted in the three (3) 68.75 MMBtu per hour boilers shall not exceed five-tenths (0.5) pounds per MMBtu of Sulfur dioxide emissions. Based on a heating value of 140,000 Btu per gallon on distillate oil, the fuel oil sulfur content shall be limited to 0.5 percent (%) Sulfur.

$$\frac{0.5 \text{ lb}}{\text{MMBtu}} = \frac{142 \text{ S lb}}{\text{kgal}} \times \frac{1 \text{ kgal}}{1000 \text{ gal}} \times \frac{1 \text{ gallon}}{0.14 \text{ MMBtu}} \quad S = 0.5 \%$$

The Technical Support Document (TSD) should reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

4. Condition D.1.2 has been changed to be as follows:

D.1.2 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-~~2-3~~ (Particulate Emissions Limitations for sources of Indirect Heating), the PM emissions from Boilers 2, 3 and 4, shall be limited to ~~0.448~~ **0.295** pounds per million Btu.

5. TSD support information for Condition D.1.2 should be as follows:

326 IAC 6-2: Particulate Emissions Limitations

The three ~~60.625~~ **68.75** MMBtu per hour boilers at the source were installed in the 1960's, therefore they are subject to the limits in 326 IAC 6-2-3. Particulate emissions from all facilities used for indirect heating purposes which were existing and in operation before September 21, 1983, shall be limited by the following equation:

$$P_t = \frac{C \cdot a \cdot h}{76.5 \cdot Q^{0.75} \cdot N^{0.25}}$$

$$= \del{0.448} \text{ } \mathbf{0.295} \text{ lb / mmBtu}$$

Where: P_t = allowable PM emissions, lb/mmBtu

C = 50 Fg/m³

a = plume rise factor = 0.67

h = stack height, ft = ~~46~~ **43.7**

N = number of stacks = 2

Q = total heat input capacity

= ~~484.875~~ **206.25** mmBtu/hr

This limit shall in no case exceed 0.8 pounds per million Btu, pursuant to 326 IAC 6-2-3(d).

With natural gas, ~~or~~ No. 6 fuel oil, or **No. 2 fuel** oil as fuel in each of the ~~60-625~~ **68.75 MMBtu** per hour boilers, the potential emissions are:

$$\frac{20.2 \text{ 22.9 ton}}{\text{yr}} \times \frac{1 \text{ yr}}{8760 \text{ hr}} \times \frac{1 \text{ hr}}{60.625 \text{ 68.75 mmBtu}} \times \frac{2000 \text{ lb}}{1 \text{ ton}} = \frac{0.076 \text{ lb}}{\text{MMBtu}} < \frac{0.448 \text{ 0.295 lb}}{\text{mmBtu}}$$

so the boilers, are in compliance with this rule.

The Technical Support Document (TSD) should reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

6. Condition D.1.5 (now renumbered D.1.4) has been changed to be as follows:

D.1.54 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to ~~326 IAC 3-3-4~~ **326 IAC 3-7-4**, the Permittee shall demonstrate that the sulfur content does not exceed 1.52 percent by weight **for No. 6 fuel oil and 0.5 percent by weight for No. 2 fuel oil** by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a certification;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the ~~thirteen (13) three (3) 68.75 MMBtu per hour heater boilers~~, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in ~~326 IAC 3-2-4~~ **326 IAC 3-6**.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

7. Condition D.1.6(a) (now renumbered D.1.5(a)) has been changed to be as follows:

- (a) Daily visible emission notations of the boiler stack exhausts shall be performed during normal daylight operations when any boiler is combusting No. 6 **or No. 2 fuel oil when exhausting to the atmosphere**. A trained employee will record whether emissions are normal or abnormal.

8. Condition D.1.7(b) (now renumbered D.1.6(a)) has been changed to be as follows:

- (b) To document compliance with Condition ~~D.1.6~~ **D.1.5**, the Permittee shall maintain records of daily visible emissions notations when combusting No. 6 **or No. 2** fuel oil in any boiler.

9. Condition D.1.8 (now renumbered D.1.7) has been changed to be as follows:

D.1.87 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 in any compliance period when No. 6 **or No. 2** fuel oil was combusted, and the natural gas boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

10. The quarterly reporting forms have been modified to include reporting for use of No. 2 fuel oil.

Comment 2:

The shot blasters listed in Section A.2 on page 6 of 47 of the draft permit are to be sold and removed from the source by the time the permit is issued.

Response to Comment 2:

All references to the shot blasters have been removed from the permit. Section D.2 of the draft permit has been deleted, and subsequent sections have been renumbered.

Comment 3:

Use of the term "fired" in describing internal combustion engines is not consistent with common usage.

Response to Comment 3:

The description of the test cells in Section A.2(4) and (5) and in Sections D.3 and D.4 have been changed to be as follows:

- (4) One (1) Diesel ~~fired~~ **fueled** internal combustion engine-driven test cell, with a capacity of 400 Horsepower, identified as Dynos-2, and exhausting to stack 192.
- (5) Three (3) gasoline ~~fired~~ **fueled** internal combustion engine-driven test cells, with a combined capacity of 963 Horsepower, identified together as Dynos-1, and exhausting to stacks 194 and 202.

The Technical Support Document (TSD) should reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

Comment 4:

The specifically regulated insignificant activities listed in Section A.3 on page 6 of 47 of the draft permit should be deleted because no applicable requirements exist for these activities.

Response to Comment 4:

As shown in Section D.5 (now renumbered Section D.4), there are applicable requirements for these insignificant activities therefore they must be included in the permit. There will be no changes to Section A.3 in the final permit, due to this comment.

Comment 5:

Condition B.6(b) on page 8 of 47 of the draft permit should be deleted because it seems to be an attempt to circumvent the permit shield.

Response to Comment 5:

Condition B.6 (Severability) has been changed to be as follows:

B.6 Severability [326 IAC 2-7-5(5)] [326 IAC 2-7-8(a)(4)]

- (a) ~~The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.~~ **a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.**
- (b) ~~Indiana rules from 326 IAC quoted in conditions in this permit are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.~~

Comment 6:

With respect to Condition B.12 Preventive Maintenance Plan, the Permittee does not recognize any requirement for preventive maintenance plans addressing any elements other than emission control equipment or monitoring systems.

Response to Comment 6:

Please also see Response to Comments 33, 34 and 37. They also address this subject.

Condition B.12 is a general condition in all Part 70 permits, intended to describe what should be included in a PMP if a PMP is determined to be necessary by conditions in Sections D of the permit.

The applicability for a PMP is not determined by the presence of control equipment for a facility. 326 IAC 2-7-5(13) requires that a provision describing the PMP required under section 4(c)(9) of the rule be included in the permit. Section 4(c)(9) simply refers to 326 IAC 1-6-3 for information that must be included in the PMP. The requirement to have a PMP is not determined by 326 IAC 1-6-3, but is determined on a case-by-case basis by IDEM, for facilities that need to have some preventive maintenance performed on a regular basis to be in compliance with applicable rules or to minimize emissions.

Condition B.12 (Preventive Maintenance Plan) has been changed to be as follows:

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) **If required by specific condition(s) in Section D of this permit,** the Permittee shall prepare **and** maintain ~~and implement~~ Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility:**
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) ~~Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;~~

- ~~(4)~~ ~~A time schedule for taking corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and~~
- ~~(5)~~(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

**Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

- (b) **The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.**
- ~~(b)~~(c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

Comment 7:

Condition B.16 Deviations from Permit Requirements and Conditions, on page 13 of 47 of the draft permit should be changed so that reporting of deviations is not required within 10 days of discovery.

Also, the discussion of emergencies in the paragraph is unclear (the permit says: Section B - Emergency Provisions, and does not indicate the condition number in Section B). The same comment was made for each condition where this type of indication was made.

Response to Comment 7:

Pursuant to 326 IAC 2-7-5(3)(C)(ii), deviations from permit requirements shall be reported in a prompt manner. The commissioner is given the authority to define "prompt", and has determined that 10 days is to be considered prompt for reporting of deviations from permit requirements.

In order to minimize errors, OAM has decided not to specify numbers in conditions to refer to other conditions, because the condition numbers can change with any modification to the permit. The table of contents at the beginning of the permit will allow the reader to easily find the indicated condition.

Condition B.16 (Deviations from Permit Requirements and Conditions) has been changed to be as follows:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any ~~corrective actions~~ **response steps** or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (b) (c) Written notification shall be submitted on the attached **Emergency/Deviation Occurrence Reporting Form** or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

Comment 8:

Condition B.26 Inspection and Entry on page 18 of 47 of the draft permit includes material not justified by the regulation cited. Entry should only be permitted for the Commissioner, an authorized representative of the Commissioner, or the U.S. EPA.

Response to Comment 8:

IC 13-14-2-2 gives the authority to 326 IAC 2-7-6 and provides powers to IDEM to enter upon private property. An employee of IDEM, with proper identification cards is considered an authorized representative of the Commissioner.

Comment 9:

Subsections (c) and (d) of Condition B.28 Annual Fee Payment, on page 18 of 47 of the draft permit, unnecessarily duplicate material covered by B.28(a) and are not consistent with 326 IAC 2-7-19. The regulation does not provide IDEM with authority to change the terms for payment of fees, and IDEM has no authority to require sources to call to determine fees if a bill is not sent.

Response to Comment 9:

Condition B.28 (now renumbered Condition B.26) has been changed to be as follows:

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM **within thirty (30) calendar days of receipt of a billing.** ~~consistent with the fee schedule established in 326 IAC 2-7-19. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.~~

- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit, ~~referral to the Office of the Attorney General for collection, or other appropriate action.~~
- (c) ~~The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.~~
- (d)(c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee ~~shall~~ **may** call the following telephone numbers: 1-800-451-6027 or ~~317-233-5674~~ **317-233-0425** (ask for OAM, ~~Data~~ **Technical Support and Modeling** Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

Comment 10:

Condition C.6(a) on page 20 of 47 of the draft permit requires facilities to be operated according to the PMP and only emission control devices and monitoring systems are required to have a PMP.

Also, Condition C.6(c) duplicates Condition C.6(a) and should be deleted.

Response to Comment 10:

Condition C.6 (now renumbered Condition C.7) (Operation of Equipment) has been changed to be as follows:

C.67 Operation of Equipment [326 IAC 2-7-6(6)]

- (a) ~~All equipment that may emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained in accordance with Section B- Preventive Maintenance Plan.~~
- (b) ~~Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation.~~
- (c) ~~The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.~~

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment are in operation.

Comment 11:

Condition C.7 Stack Height, on page 21 of 47 of the draft permit, should be deleted because there are no applicable stacks at the source.

Response to Comment 11:

The potential emissions of sulfur dioxide from the boilers are greater than 25 tons per year, therefore, 326 IAC 1-7 does apply to these stacks. OAM is not taking action against sources with previously constructed stacks that do not meet GEP, but Condition C.7 was included in the permit to let the source know that the rule does apply and any modification to this stack will require prior approval by IDEM.

Condition C.7 (now renumbered Condition C.8) (Stack Height) has been modified for clarification to be as follows:

C.78 Stack Height [326 IAC 1-7]

~~(a)~~ The Permittee shall comply with the **applicable** provisions of 326 IAC 1-7 (Stack Height Provisions), ~~that apply to~~ **for** all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

~~(b)~~ ~~Stacks shall be constructed using good engineering practice (GEP) according to the following equation:~~

$$S = H + 1.5 (L) \quad \text{where: } S = \text{Stack height, (feet)}$$

~~H = Height of supporting or nearby structure (whichever is largest), (feet)~~
~~L = Lesser dimension (height or width) of the structure chosen for H, (feet)~~

~~(c)~~ ~~Any changes in the applicable stacks require prior approval from IDEM, OAM.~~

Comment 12:

Condition C.12(c)

In general, this condition unnecessarily duplicates material in other terms, including Condition C.11 and C.12(a). Furthermore, "quality assure" is not a verb.

Condition C.12 (d)

The first sentence is not clear. The second sentence unnecessarily duplicates material in Condition C.12(b).

Response to Comment 12:

Condition C.12 (now renumbered Condition C.13) (Maintenance of Monitoring Equipment) has been changed to be as follows:

C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

~~(a)~~ ~~The Permittee shall perform all necessary maintenance and make all necessary and reasonable attempts to keep all required monitoring equipment in proper operating condition at all times.~~

~~(b)~~**(a)** In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

~~(c)~~**(b)** The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. **In addition, prompt corrective action shall be initiated whenever indicated.**

~~(d)~~ ~~Preventive Maintenance Plans for the monitors shall be implemented. In addition, prompt corrective action shall be initiated whenever indicated.~~

Comment 13:

Condition C.13 Monitoring Methods on page 22 of 47 of the draft permit is unclear and should be reworded for clarification.

Response to Comment 13:

Condition C.13 (now renumbered Condition C.14) (Monitoring Methods) has been changed to be as follows:

C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed ~~whenever applicable~~ according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, ~~as appropriate or other approved methods is as~~ specified in this permit.

Comment 14:

Condition C.14 Pressure Gauge Specifications, on page 22 of 47 of the draft permit is unrealistic and the accuracy within 2% of full scale should be removed. Also the term "taking" is not appropriate.

Response to Comment 14:

Condition C.14 (now renumbered Condition C.15) is required by OAM to ensure that the operational parameters that are set in the permit are in fact being met by the source. Without requiring a certain degree of accuracy in the equipment, the operating parameters we set will not have much meaning. The term "taking" of pressure drop, has been replaced with "measurement" of pressure drop in the final permit.

Comment 15:

Condition C.17 Risk Management Plan on page 24 of 47 of the draft permit is unclear and should be reworded.

Response to Comment 15:

The introductory paragraph of Condition C.17 has been changed to be as follows:

If a regulated substance, **subject to 40 CFR 68**, is present **in a process** in more than the threshold quantity ~~that is subject to 40 CFR 68~~, 40 CFR 68 is an applicable requirement and the Permittee shall:

Comment 16:

The regulation cited in Condition C.18(b) on page 25 of 47 does not support the requirement to include provisions for response to non-compliance with monitoring provisions in the PMP.

Response to Comment 16:

Condition C.18 (Compliance Monitoring Plan - Failure to Take Corrective Action) has been changed to be as follows:

C.18 Compliance Monitoring Plan - Failure to Take Corrective Action Response Steps [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 1-6]

-
- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) ~~The Preventive Maintenance Plan described in Section B, Preventive Maintenance Plan, of this permit.~~ **A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM,. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:**
 - (A) **Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and**
 - (B) **A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.**
- (b) For each compliance monitoring condition of this permit, appropriate ~~corrective actions~~ **response steps**, as described in the ~~Preventive Maintenance Plan~~, shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the ~~corrective actions~~ **response steps** within the prescribed time contained within the ~~Preventive Maintenance~~ **Compliance Response** Plan shall constitute a violation of the permit unless taking the ~~corrective action~~ **response steps** set forth in the ~~Preventive Maintenance~~ **Compliance Response** Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee ~~may be~~ **is** excused from taking further ~~corrective action~~ **response steps** for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further ~~corrective actions~~ **response steps** providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the **compliance monitoring** parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) ~~The Permittee determines that~~ The process has already returned to operating within "normal" parameters and no ~~corrective action~~ **is response steps are** required.

- (d) Records shall be kept of all instances in which the action ~~values were~~ **compliance related information was** not met and of all ~~corrective actions~~ **response steps** taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

Comment 17:

Condition C.19 Actions Related to Noncompliance Demonstrated by a Stack Test on page 25 of 47 of the draft permit should be reworded for clarity.

Response to Comment 17:

Condition C.19 (Actions Related to Noncompliance Demonstrated by a Stack Test) has been changed to be as follows:

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test **[326 IAC 2-7-5]
[326 IAC 2-7-6]**

-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions ~~shall be taken~~. **The Permittee shall submit** a description of these corrective actions ~~shall be submitted~~ to IDEM, OAM, within thirty (30) days of receipt of the test results. ~~These corrective actions shall be implemented immediately unless notified by IDEM, OAM that they are not acceptable.~~ The Permittee shall ~~make every effort~~ **take appropriate action** to minimize emissions from the affected facility while the corrective actions are being implemented. **IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency.** IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. **Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.** Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment 18:

The requirement to report emissions of other regulated pollutants is not supported by 326 IAC 2-6 and should be removed from Condition C.20(a)(2) on page 26 of 47 of the draft permit. Also, use of the term "contain" is inappropriate with regard to providing information in an emission statement.

Response to Comment 18:

326 IAC 2-7-19(c) states that "The annual emission statement submitted during the previous calendar year required by 326 IAC 2-6 or section 5(3)(C)(iii) of this rule and other available information shall be the basis for determining total tons of actual emission of each regulated pollutant." The purpose of the emission statement required by this permit is not only to fulfill the requirements of 326 IAC 2-6, but also as a basis for fee assessment. Fees are assessed for other regulated pollutants such as HAPs therefore the information must be included in the emission report.

The term "contain" in subsections (a)(1) and (a)(2) have been replaced with "indicate" in the final permit.

The Section indicated in subsection (b), for submittal of the emission statement, has been changed from the Data Support Section to the Technical Support and Modeling Section, in the final permit.

Subsection (c) of Condition C.20 (Emission Statement) has been changed to be as follows:

- (c) This annual emission statement required by this permit shall be **considered** timely if ~~delivered by any method and received and stamped the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received~~ by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

Comment 19:

Condition C.21 Monitoring Data Availability on page 26 of 47 of the draft permit should be combined with other conditions because the subparagraphs have no relation to the subject of monitoring data availability.

Response to Comment 19:

Subsections (a) and (b) of Condition C.21 (Monitoring Data Availability) has been changed to be as follows:

- (a) **With the exception of performance tests conducted in accordance with Section C - Performance Testing,** All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) **As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above,** ~~When~~ when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

Comment 20:

The requirement of Condition C.22(a) on page 27 of 47 of the draft permit to make records kept on site available within one hour upon verbal request by an agency representative is not supported by the regulation cited.

Response to Comment 20:

IDEM has determined that the time frame of one hour to produce documents that are on site, is adequate and sufficient. There will be no changes to this condition in the final permit, due to this comment.

Comment 21:

The numbered emission unit descriptions in boxes at the beginning of each subsection of Section D are confusing, since the numbers assigned have no relation to the subsection numbers.

Response to Comment 21:

The numbers correspond to the listings of emission units in section A.2 and A.3 and have been deemed necessary by OAM for easy reference and accountability. No changes will be made to these descriptions due to this comment.

Comment 22:

The regulation cited in Condition D.1.3 on page 29 of 47, Condition D.2.2 on page 32 of 47, Condition D.3.2 on page 35 of 47 and Condition D.4.1 on page 37 of 47 of the draft permit, refers to permit application not permit content. Also, the conditions are unnecessary because the condition for PMP is already in the General Conditions in B.12.

Response to Comment 22:

The PMP condition in Section B is a general condition that describes the content of a PMP and is included in all Part 70 permits. Sections D are specific requirements for each facility and will include the requirement to maintain a PMP if it is deemed necessary.

The rule cite for all Preventive Maintenance Plan conditions in D sections of the permit have been changed from 326 IAC 2-7-4(c)(9) to 326 IAC 2-7-5(13) to reflect that PMPs shall be maintained and implemented by the Permittee.

Comment 23:

Condition D.1.6 Visible Emissions Notations on page 30 of 47, Condition D.2.5 on page 33 of 47 and Condition D.4.3 on page 37 of 47 of the draft permit should be deleted because notations are not required for compliance with applicable requirements and visible emission notations are subjective, unreliable, impractical and unnecessary.

Response to Comment 23:

Visible emissions notations are used to indicate compliance with 326 IAC 5-1 Opacity Limitations without the requirement to have a person on site trained in opacity measurement. This requirement is designed as a trigger that the source perform some corrective action on the facility if visible emissions are abnormal, to ensure continuous compliance with opacity limitations.

Subsection (e) of Conditions D.1.6 (now renumbered Condition D.1.5), D.3.4 (now renumbered Condition D.2.4), and D.4.3 (now renumbered Condition D.3.3) have changed to be as follows:

- (e) The ~~Preventive Maintenance~~ **Compliance Response** Plan for this unit shall contain troubleshooting contingency and ~~corrective actions~~ **response steps** for when an abnormal emission is observed.

Comment 24:

In Condition D.1.7(a)(2) on page 30 of 47 of the draft permit, the substance, usage of which is to be recorded, and the value to be calculated are not specified.

Response to Comment 24:

Condition D.1.7(a)(2) (now renumbered D.1.6(a)(2)) has been changed to be as follows:

- (2) Actual **fuel oil** usage since last compliance determination period and ~~value calculated per limitation~~ **equivalent sulfur dioxide emissions**;

Comment 25:

Condition D.1.7(a)(3) on page 30 of 47 of the draft permit could be interpreted as requiring fuel sulfur content certification for natural gas which is not necessary under Condition D.1.1.

Response to Comment 25:

Section (a) of Condition D.1.7 (now renumbered D.1.6) is to show compliance with Condition D.1.1 which does not indicate any limit with respect to natural gas. There will be no change in this condition resulting from this comment.

Comment 26:

Applicable requirements do not provide for limits on PM10 emissions for facilities listed under Section D.2.

Calculation of allowable emissions were incorrectly based on the blast media delivery rate, rather than the weight of transmission parts processed and limits are not correctly calculated from the formula in 326 IAC 6-3-2.

Response to Comment 26:

The PM-10 limits were set in order for each of the modifications to the source be considered as a minor modifications to a PSD source as explained in the Technical Support Document.

It is the definition by rule 326 IAC 1-2-59 to use the media delivery rate as the process weight rate to calculate limits based on 326 IAC 6-3-2. Calculations were performed according to the documentation on page 7 of 16 of the TSD and based on information given in the application. No changes were made to the final permit, in response to this comment.

Comment 27:

Compliance stack tests required for facilities listed in Section D.2 are not justified by an underlying applicable requirement. Fugitive emission points I, J, and K are incorrectly identified as stacks and stack testing cannot be performed at these emission points.

Response to Comment 27:

Section D.2 has been removed from the permit since these facilities are no longer in operation at this source. The remaining sections of the permit have been renumbered.

Comment 28:

Justification for Condition D.2.7 on page 33 of 47 of the draft permit is lacking and the wording is confusing. Also the requirement duplicates issues addressed under Conditions C.6 and B.12.

Response to Comment 28:

Section D.2 has been deleted from the permit because these facilities are no longer at the source. The remaining sections of this permit have been renumbered.

Comment 29:

Condition D.3.4 Visible Emissions Notations on page 35 of 47 of the draft permit should be deleted because notations are not required for compliance with applicable requirements and visible emission notations are subjective, unreliable, impractical and unnecessary. Also the exhaust stack of the test cell is not visible from the ground.

Response to Comment 29:

Visible emissions notations are used to indicate compliance with 326 IAC 5-1 Opacity Limitations without the requirement to have a person on site trained in opacity measurement. This requirement is designed as a trigger that the source perform some corrective action on the facility if visible emissions are abnormal, to ensure continuous compliance with opacity limitations. There will be no change in this condition due to this comment.

Comment 30:

Sections D.5 and D.6 should be removed from the permit because permit conditions are not justified by applicable requirements.

Response to Comment 30:

Section D.6 has been removed from the final permit because Condition C.2 "Particulate Matter Emission Limitations for Processes with Process Weight Rates Less than One Hundred (100) Pounds Per Hour" will cover the requirements for the insignificant grinding operations.

Borg Warner has agreed to comply with the applicable 326 IAC 8-3 degreaser rules, therefore Condition D.5.1 (now renumbered Condition D.4.1) has changed to be as follows:

D.54.1 Volatile Organic Compounds (VOCs) [326 IAC 8-3]

~~The degreasers at the source shall be limited to 15 pounds per day of VOC emissions and 145 gallons of solvent usage per twelve (12) month rolling total, so that 326 IAC 8-3 will not apply. This will cause the degreasers to be considered as insignificant activities.~~

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

(B) The solvent is agitated; or

(C) The solvent is heated.

- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Conditions D.5.3 (Record Keeping) and D.5.4 (Reporting) have also combined, renumbered and changed to be as follows:

D.54.3 Record Keeping and Reporting Requirements

-
- ~~(a) To document compliance with Conditions D.5.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.5.1.~~

- (1) ~~The amount and VOC content of each degreasing solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;~~
 - (2) ~~A log of the dates of use;~~
 - (3) ~~The total VOC usage for each month; and~~
 - (4) ~~The weight of VOC emitted for each compliance period.~~
- (b) ~~These records shall be maintained in accordance with Section C – General Record Keeping Requirements.~~

There are no record keeping or reporting requirements for these insignificant activities.

~~D.5.4 Reporting Requirements~~

~~A summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, upon request.~~

On December 22, 1997, ERM, consultant for Borg Warner Automotive, submitted additional comments on the proposed Part 70 permit. The summary of the comments is as follows (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

Comment 31:

The first sentence of Condition B.1 on page 8 of 49 of the proposed permit has no relation to the condition title, and subsection (b) of the condition should not be separated from subsection (a).

Response to Comment 31:

The first sentence of Condition B.1 (Permit No Defense) does relate to the title. The Permittee is responsible for complying with new applicable rules enacted after the permit is issued. The permit is not a defense for any failure to comply with new requirements. This condition clarifies the language of 326 IAC 2-1-10 (Permit No Defense), which is paraphrased in the second sentence of subsection (a) and (b) of this condition. There will be no changes to this condition in the final permit due to this comment.

Comment 32:

Condition C.6 is confusing and could be interpreted as requiring operation of control equipment at times when the emission unit serviced by a particular piece of equipment is not operating.

Response to Comment 32:

OAM feels that the present language of Condition C.6 (now renumbered Condition C.7) (Operation of Equipment) is clear. Your comment did not state at what times or circumstances the permit language could be interpreted the way you suggest. There will be no changes to this condition in the final permit due to this comment.

Comment 33:

The requirement for a Compliance Monitoring Plan is not supported by the regulation cited in Condition C.18, and this condition should be in Section D of the permit. Compliance monitoring provisions should be consistent with published IDEM policies.

Subsection (a)(5) of the condition requiring a Compliance Response Plan, is not supported by any applicable requirement, and in creating entirely new requirements, IDEM is attempting to conduct rulemaking without public notice and comment.

Response to Comment 33:

326 IAC 2-7-5(3) does support the requirement for a Compliance Monitoring Plan. Your comment does not state which portion of C.18, besides (a)(5), you find unsupported.

Section C contains the general conditions for the entire source, and Sections D provide for specific requirements for each facility. This condition is in Section C of all Part 70 permits.

You have not stated which "IDEM policies" are inconsistent with the compliance monitoring provisions. OAM feels that there are no inconsistencies.

It is true that the term "Compliance Response Plan" is not found in 326 IAC 2-7-5(3), but subsection (A) of that rule sets out compliance monitoring requirements concerning the use, maintenance, and where appropriate, installation of monitoring equipment or methods. In addition 326 IAC 2-7-5(1) sets out that the permit must contain those operational requirements and limitations that assure compliance with all applicable requirements. Therefore, there will be no changes to this condition in the final permit due to this comment.

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each permittee's Annual Compliance Certification. Each permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Part 70 permit program.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a permittee's maintenance staff handle the routine maintenance of the equipment, and a permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the “corrective actions” and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the “corrective actions” to “response steps.” That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comment sought clarification on whether the failure to follow the PMP was violation of the permit. The concern was that a permittee's PMP might call for the permittee to have, for example, three “widget” replacement parts in inventory. If one widget was taken from inventory for use in maintenance, then the permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the permittee fails to follow its PMP, a permit violation will occur only of the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Most permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment. The permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the permittee may know from experience, what replacement parts should be kept on hand. The permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be included in every applicable Part 70 permit pursuant to 326 IAC 2-7-5(13). This rule refers back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3-(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and

- (3) The identification and quantification of the replacement parts for the facility which the permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manufacturer's trouble shooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the permittee's business process.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading. Some of the terminology has changed, as a result of the comments from regulated sources, but the requirements in the permit do not conflict with the guidance.

Comment 34:

The requirement for a PMP for the boilers in Section D.1 and the test cells in Sections D.3 and D.4 is not supported by any applicable requirement because the PMP is only for facilities with control devices.

Response to Comment 34:

It is not a correct interpretation of 326 IAC 1-6-3 (Preventive Maintenance Plan) that only facilities with control equipment are subject to this rule. OAM has determined that PMPs are required for uncontrolled facilities with actual emissions greater than 25 tons per year. Because actual emissions will only be greater than 25 tons per year when burning back-up fuel in these boilers, the PMP requirement has been removed from the final permit, and subsequent conditions have been renumbered.

The applicability for the requirement of a PMP is for any facility required to have a permit under 326 IAC 2-1-2 and 2-1-4. Also 326 IAC 1-6-3(b) says that the Commissioner can deem it necessary for the facility to have a PMP. The information asked for in 326 IAC 1-6-3, as part of a PMP, is what the PMP shall include, but not what it is limited to include. Because of the potential for increased emissions from these test cells, when the cells are not kept clean, and in good working condition, there is a need for a PMP for these facilities. The PMP should include, but is not limited to, any maintenance performed on the cells, who performs the maintenance, and when it is performed.

Comment 35:

Visible Emissions notations are subjective, unreliable, impractical and unnecessary.

Since the only applicable requirement for the facilities in Section D.1 is the sulfur dioxide provision, record keeping and reporting is sufficient to satisfy any and all monitoring requirements.

The use of fuel oil is infrequent and unpredictable, therefore it is not possible to provide the hypothetical "training" on the appearance and characteristics of normal visible emissions.

Response to Comment 35:

Please refer to Response to Comment 23 of the draft permit.

Other applicable requirements for these facilities are 326 IAC 6-2-3 (Particulate Matter Emissions) and 326 IAC 5-1 (Opacity). In order to show compliance with these requirements, there has to be record keeping of the stack emissions. IDEM is not requiring a certified opacity reader to make percentage readings. All that is required is that an employee who is familiar with how the stack emissions look under normal conditions, and has been at the plant for one month, looks at the stack emissions once per day to see if emissions seem normal. If emissions are abnormal, the actions set out in the Compliance Response Plan must be taken unless excused under Condition C.18 (Compliance Monitoring Plan - Failure to Take Response Steps).

The training of the employee can consist of showing the qualified employee what the normal stack emissions look like on the next occasion that the facility burns fuel oil. If you find this impractical, we would consider changing the requirement to require opacity readings by a certified opacity reader, during times the facility burns fuel oil.

Comment 36:

Condition D.1.7(a)(3) on page 30 of 47 of the draft permit could be interpreted as requiring fuel sulfur content certification for natural gas which is not necessary under Condition D.1.1.

Response to Comment 36:

Please refer to Response to Comment 25 of the draft permit.

Comment 37:

The requirement to prepare a PMP for emission units in Sections D.3 and D.4 are not supported by any applicable requirement, because they have no emission control devices.

Response to Comment 37:

The applicability for the requirement of a PMP is for any facility required to have a permit under 326 IAC 2-1-2 and 2-1-4. Also 326 IAC 1-6-3(b) says that the Commissioner can deem it necessary for the facility to have a PMP. The information asked for in 326 IAC 1-6-3, as part of a PMP, is what the PMP shall include, but not what it is limited to include. Because of the potential for increased emissions from these test cells, when the cells are not kept clean, and in good working condition, there is a need for a PMP for these facilities. The PMP should include, but is not limited to, any maintenance performed on the cells, who performs the maintenance, and when it is performed.

Comment 38:

Visible Emissions notations are subjective, unreliable, impractical and unnecessary.

The exhaust points of the facilities in Section D.3 and D.4 of the proposed permit, are not visible from the ground or from any other point with safe access.

Test cells operate under conditions of variable engine speed and load, therefore, there is no "normal" operating conditions and the "part of the operation that would normally be expected to cause the greatest emissions" is impossible to determine or define.

Response to Comment 38:

Please refer to Response to Comment 23 of the draft permit.

Another applicable requirement for these facilities is 326 IAC 5-1 (Opacity). In order to show compliance with this requirements, there has to be record keeping of the stack emissions. IDEM is not requiring a certified opacity reader to make percentage readings. All that is required is that an employee who is familiar with how the stack emissions look under normal conditions, and has been at the plant for one month, looks at the stack emissions once per day to see if emissions seem normal. If emissions are abnormal, the actions set out in the Compliance Response Plan must be taken unless excused under Condition C.18 (Compliance Monitoring Plan - Failure to Take Response Steps).

The source is probably aware of what operating conditions the greatest load is put on the test cell. This is the time when the visible emissions notations should be made.

If there is no way to safely see the stack emissions, OAM suggests the installation of a video monitor to allow the qualified employee to view the emissions from a safe place. If Borg-Warner is in agreement with this change, they should submit a request for an amendment to the Part 70 permit, in order to make this change.

Comment 39:

The formula given in Condition D.6.1 on page 40 of 49 of the proposed permit is used only for interpolation between values of the process weight in the table in 326 IAC 6-3-2(c) up to 60,000 lb/hr, therefore the word "extrapolation" should be removed from the condition.

Response to Comment 39:

Section D.6 has been deleted from the final permit because Condition C.2 covers the requirements for this activity. Therefore, a separate D Section is not required.

Comment 40:

Condition A.1 "General Information" - please change the zip code to 47304 and change the word transmissions to transfer cases.

Response to Comment 40:

Condition A.1 "General Information" has been changed to be as follows:

A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
The Permittee owns and operates a stationary automobile transmission transfer cases manufacturing plant.	

Responsible Official:	Timothy M. Manganello, Plant Manager
Source Address:	5401 Kilgore Ave., Muncie, Indiana, 47302 47304
Mailing Address:	5401 Kilgore Ave., Muncie, Indiana, 47302 47304
SIC Code:	3714
County Location:	Delaware County
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Major Source, under PSD Rules;

Comment 41:

We obtained a construction permit for insignificant four (4) natural gas fired air make up units. Please add these units into the final permit.

Response to Comment 41:

On April 17, 1998, IDEM, OAM issued a Registration (CP035-9114-00020) for the following equipment:

- (a) One (1) air make-up heater, identified as Y810, with a heat input capacity of 10 million British thermal units per hour (mmBtu/hr), and
- (b) Three (3) air make-up units, identified as Y811, Y812, and Y814, each has a heat input capacity of 5 million British thermal units per hour (mmBtu/hr).

Since these air make-up units do not have any applicable requirements except 326 IAC 5-1-2 (Visible Emission Limitations). These units are considered to be insignificant and therefore do not need to be listed in the final permit.

Upon further review, OAM has made the following changes to the final Part 70 permit (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

- 1. The first paragraph on the title page of the permit was changed to be as follows:

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the ~~facilities listed~~ **source described** in Section A (Source Summary) of this permit.
- 2. A "Source Summary" has been changed to be as follows:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and ~~presented in the permit application.~~ **The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.**

- 3. The following rule cite was added to the title lines of Conditions A.1 (General Information), and A.2 (Emission Units and Pollution Control Equipment Summary):

[326 IAC 2-7-5(15)]

- 4. The title line and first paragraph of Condition A.3 (Specifically Regulated Insignificant Activities) has been changed to be as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities **which are specifically regulated**, as defined in ~~326 IAC 2-7-1(20)~~ **326 IAC 2-7-1(21)**:

- (1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
 - ~~(2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.~~
5. Subsection (a) of Condition A.4 (Part 70 Applicability), on page 7 of 47 of the draft permit, has been changed to be as follows:
 - (a) It is a major source, as defined in ~~326 IAC 2-7-1(21)~~ **326 IAC 2-7-1(22)**.
6. Condition A.5 (Prior Permit Conditions Superseded) has been deleted from the final permit as follows:

A.5 Prior Permit Conditions Superseded [326 IAC 2]

~~This permit supersedes the operating conditions of all construction and operating permits issued to this stationary source under 326 IAC 2 prior to the effective date of this Part 70 permit.~~
7. Condition B.1 has been changed to be as follows:

B.1 General Requirements Permit No Defense [IC 13-15] [IC 13-17] [326 IAC 2-1-10] [IC 13]

~~The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.~~

 - (a) **Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.**
 - (b) **This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."**
8. Condition B.6 (Severability) has been changed to be as follows:

B.6 Severability [326 IAC 2-7-5(5)]

 - ~~(a) The provisions of this permit are severable; and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.~~ **a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.**
 - ~~(b) Indiana rules from 326 IAC quoted in conditions in this permit are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.~~
9. Subsection (c) of Condition B.8 (Duty to Supplement and Provide Information) has been changed to be as follows:

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, For information claimed to be confidential, the Permittee must shall furnish such records directly to the U.S. EPA and IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**

~~Such confidentiality claim shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM):~~

10. Condition B.10 (Certification) has been changed to be as follows:

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) ~~This One (1)~~ certification shall be ~~submitted~~ **included**, on the attached Certification Form, **with each submittal**.
- (c) A responsible official is defined at ~~326 IAC 2-7-1(33)~~ **326 IAC 2-7-1(34)**.

11. Condition B.11 (Annual Compliance Certification) has been changed to be as follows:

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) ~~The Permittee shall annually certify that the source has complied~~ **submit a compliance certification report which addresses status of the source's compliance** with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall **cover the time period from January 1 to December 31 of the previous year, and shall** be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) ~~This~~ **The** annual compliance certification report required by this permit shall be **considered** timely if ~~delivered by any method and received and stamped the date~~ **postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]**

- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was **based on** continuous or intermittent **data**;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
 - (5) **Any insignificant activity that has been added without a permit revision; and**
 - ~~(5)~~ (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

12. Condition B.12 “Preventive Maintenance Plan” has been changed to be as follows:

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

-
- (a) **If required by specific condition(s) in Section D of this permit**, the Permittee shall prepare **and** maintain ~~and implement~~ Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - ~~(3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;~~
 - ~~(4) A time schedule for taking corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and~~
 - ~~(5)~~ (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

**Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

- (b) **The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.**
- ~~(b)~~(c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

13. The statement following subsection (5)(C) of Condition B.13 (Emergency Provisions) has been changed to be as follows:

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33) **326 IAC 2-7-1(34).**

14. Condition B.14 (Permit Shield) has been changed to be as follows:

B.14 Permit Shield [326 IAC 2-7-15]

- (a) **This condition provides a permit shield as addressed in 326 IAC 2-7-15.**
- ~~(a)~~ (b) **This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.**
Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided ~~that either of the following:~~
 - (1) The applicable requirements are included and specifically identified in this permit; **or**
 - (2) ~~IDEM, OAM in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof. The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~
- ~~(b)~~ (c) **No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in, or subsequent to, the permit application. If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.**
- ~~(c)~~ (d) **If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.**

~~(d)~~ **(e)** Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

~~(e)~~ **(f)** This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

~~(f)~~ **(g)** This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. **[326 IAC 2-7-12(c)(7)]**

~~(g)~~ **(h)** This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. **[326 IAC 2-7-12(b)(8)]**

15. Condition B.16 "Deviations from Permit Requirements and Conditions" has been changed to be as follows:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any ~~corrective actions~~ **response steps** or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
- (2) An emergency as defined in 326 IAC 2-7-1(12); or**
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (b) (c) Written notification shall be submitted on the attached **Emergency/Deviation Occurrence Reporting Form** or its substantial equivalent. **The notification does not need to be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).**
- (d) **Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.**
16. The first paragraph of subsection (a), and subsection (b)(1) of Condition B.18 (Permit Renewal) have been changed to be as follows:
- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include, ~~at minimum,~~ the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in ~~326 IAC 2-7-1(20)~~ **326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).**
- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) ~~The Permittee has a duty to submit a timely and complete permit renewal application.~~ A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) ~~Delivered by any method and received and stamped~~ **If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping label, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received** by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
17. Condition B.19 “Administrative Permit Amendment”, Condition B.20 “Minor Permit Modification”, and Condition B.21 “Significant Permit Modification” have all been combined into one condition numbered Condition B.19 “Permit Amendment or Modification” as follows. The remaining conditions of this section have been renumbered:
- ~~B.19 Administrative Permit Amendment [326 IAC 2-7-11]~~
- (a) ~~An administrative permit amendment is a Part 70 permit revision that makes changes of the type specified under 326 IAC 2-7-11(a).~~
- (b) ~~An administrative permit amendment may be made by IDEM, OAM consistent with the procedures specified under 326 IAC 2-7-11(c).~~
- (c) ~~The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]~~
- ~~B.20 Minor Permit Modification [326 IAC 2-7-12]~~
- (a) ~~A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendments under 326 IAC 2-7-11.~~
- (b) ~~Minor modification to this permit shall follow the procedures specified under 326 IAC 2-7-12(b).~~
- (c) ~~An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-7-12(b) and shall include the information required in 326 IAC 2-7-12(b)(3)(A) through (E).~~

- ~~(d) The Permittee may make the change draft in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-7-12(b)(6)(A) through (C), the Permittee must comply with both the applicable requirements governing the change and the draft permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its draft permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-7-12(b)(7)]~~

~~B.21 Significant Permit Modification [326 IAC 2-7-12(d)]~~

- ~~(a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.~~
- ~~(b) Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.~~
- ~~(c) Nothing in 326 IAC 2-7-12(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-7 that would render existing permit compliance terms and conditions irrelevant.~~
- ~~(d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.~~

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:**
- Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**
- Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.**
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

18. Subsection (a) of as follows has been added to Condition B.22 (now renumbered Condition B.20) (Permit Revision Under Economic Incentives and Other Programs):

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.**

19. The first sentence of Condition B.23 (now renumbered Condition B.21) (Changes Under Section 502(b)(10) of the Clean Air Act) has been changed to be as follows:

The Permittee may make Section 502(b)(10) of the Clean Air Act changes **(this term is defined at 326 IAC 2-7-1(36))** without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

20. The word "therein" in subsection (a)(3) of Condition B.24 (now renumbered Condition B.22) (Operational Flexibility) has been changed to "**herein**".

21. Subsections (b) and (c) of Condition B.24 (now renumbered Condition B.22) (Operational Flexibility) have been changed to be as follows:

- (b) For each such **Section 502(b)(10) of the Clean Air Act** change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by ~~326 IAC 2-7-1(33)~~ **326 IAC 2-7-1(34)**.

- (c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20~~(a)~~**(c)**.

22. Condition B.25 (now renumbered Condition B.23) (Construction Permit Requirement) has been changed to be as follows:

B.2523 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, Modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

23. Condition B.26 (now renumbered Condition B.24) "Inspection and Entry" has been changed to be as follows:

B.2624 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of **IDEM proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

- (1) **The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]**
- (2) **The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]**

24. Subsection (b) of Condition B.27 (now renumbered Condition B.25) (Transfer of Ownership) has been changed to be as follows:

- (b) The written notification shall be sufficient to transfer the permit to the new owner **by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

25. Condition B.28 (now renumbered Condition B.26) "Annual Fee Payment" has been changed to be as follows:

B.2826 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM **within thirty (30) calendar days of receipt of a billing.** ~~consistent with the fee schedule established in 326 IAC 2-7-19. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.~~
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit, ~~referral to the Office of the Attorney General for collection, or other appropriate action.~~
- (c) ~~The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.~~

~~(d)(c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, The Permittee shall~~ **may** call the following telephone numbers: 1-800-451-6027 or ~~317-233-5674~~ **317-233-0425** (ask for OAM, ~~Data~~ **Technical Support and Modeling** Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

26. Condition B.28 "Credible Evidence" has been added to the end of section B as follows:

B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or noncompliance.

27. Condition C.1 (Major Source) has been changed to be as follows:

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) **and 40 CFR 52.21**, this source is a major source. ~~This status includes those activities at the source that are considered insignificant activities. The source shall be allowed to add insignificant activities not already in the permit.~~

28. Condition C.2 "Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred pounds per hour" has been added to the permit as follows. The remaining conditions of this section have been renumbered:

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

29. Condition C.2 (now renumbered Condition C.3) (Opacity), the statement "This condition is not federally enforceable." has been deleted from the final permit.

30. Condition C.3 (now renumbered Condition C.4) (Open Burning) has been changed from:

C.34 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. **The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.**

31. Condition C.4 (now renumbered Condition C.5) (Incineration), the statement "This condition is not federally enforceable." has been deleted from the final permit.

32. Condition C.5 (now renumbered Condition C.6) (Fugitive Dust Emissions) has been changed to be as follows:

C.56 Fugitive Dust Emissions [326 IAC 6-4]

~~The Permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)]~~

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

33. Condition C.6 (now renumbered Condition C.7) "Operation of Equipment" has been changed to be as follows:

C.67 Operation of Equipment [326 IAC 2-7-6(6)]

- (a) ~~All equipment that may emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained in accordance with Section B - Preventive Maintenance Plan.~~
- (b) ~~Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation.~~
- (c) ~~The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.~~

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment are in operation.

34. Condition C.7 (now renumbered Condition C.8) (Stack Height) has been changed to be as follows:

C.78 Stack Height [326 IAC 1-7]

- (a) ~~The Permittee shall comply with the **applicable** provisions of 326 IAC 1-7 (Stack Height Provisions), that apply to for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.~~
- (b) ~~Stacks shall be constructed using good engineering practice (GEP) according to the following equation:~~

$$S = H + 1.5 (L) \quad \text{where: } S = \text{Stack height, (feet)}$$
$$H = \text{Height of supporting or nearby structure (whichever is largest), (feet)}$$
$$L = \text{Lesser dimension (height or width) of the structure chosen for H, (feet)}$$

- (c) ~~Any changes in the applicable stacks require prior approval from IDEM, OAM.~~

35. Condition C.8 (Asbestos Abatement Projects - Accreditation) and Condition C.15 (Asbestos Abatement Projects) has been deleted from the final permit and replaced with the following condition:

C.8 ~~Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]~~

~~Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos-containing material. The requirement that the inspector be Indiana accredited is not federally enforceable.~~

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

36. Condition C.9 (now renumbered Condition C.10) (Performance Testing) has been changed to be as follows:

C.910 Performance Testing ~~[326 IAC 3-2.1]~~ **[326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of ~~326 IAC 3-2.1~~ **326 IAC 3-6** (Source Sampling Procedures), **except as provided elsewhere in this permit**, utilizing methods approved by IDEM, OAM.

A test protocol, **except as provided elsewhere in this permit**, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

- (b) **All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.**

37. Condition C.10 (now renumbered Condition C.11) "Compliance Schedule" has been changed to be as follows:

C.4011 Compliance Schedule ~~[326 IAC 2-7-6(3)]~~

The Permittee:

- (a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

38. Condition C.11 (now renumbered Condition C.12) (Compliance Monitoring) has been changed to be as follows:

C.4412 Compliance Monitoring ~~[326 IAC 2-7-5(3)]~~ **[326 IAC 2-7-6(1)]**

Compliance with applicable requirements shall be documented ~~in accordance with the provisions of 326 IAC 2-7-5(3)~~ **as required by this permit**. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend compliance schedule an additional ninety (90) days provided the Permittee shall** notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date. and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by ~~326 IAC 2-7-1(33)~~ **326 IAC 2-7-1(34)**.

39. Condition C.13 (now renumbered Condition C.14) "Monitoring Methods" has been changed to be as follows:

C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed ~~whenever applicable~~ according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, ~~as appropriate or other approved methods is as~~ specified in this permit.

40. The heading "Corrective Actions" has been changed to "Corrective Actions and Response Steps".
41. Condition C.16 "Emergency Reduction Plans" has been changed to be as follows:

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM shall supply such plan.~~
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

- (f) Upon direct notification by IDEM, OAM that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

42. Condition C.17 "Risk Management Plan" has been changed to be as follows:

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, **subject to 40 CFR 68**, is present **in a process** in more than the threshold quantity, ~~that is subject to 40 CFR 68~~, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

43. The rule cites of Condition C.18 "Compliance Monitoring Plan - Failure to Take Response Steps" have been changed to be as follows:

C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]**[326 IAC 2-7-6]**
[326 IAC 1-6]

44. Condition C.19 "Actions Related to Noncompliance Demonstrated by a Stack Test" has been changed to be as follows:

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test **[326 IAC 2-7-5]**
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions ~~shall be taken~~. **The Permittee shall submit** a description of these corrective actions ~~shall be submitted~~ to IDEM, OAM, within thirty (30) days of receipt of the test results. ~~These corrective actions shall be implemented immediately unless notified by IDEM, OAM that they are not acceptable.~~ The Permittee shall ~~make every effort take~~ **appropriate action** to minimize emissions from the affected facility while the corrective actions are being implemented. **IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency.** IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. **Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.** Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

45. Condition C.20(a) "Emission Statement" has been changed to be as follows:

- (a) The Permittee shall submit ~~an certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

46. The title and Subsections (a) and (c)(4) of Condition C.22 (General Record Keeping Requirements) has been changed to be as follows:

C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)] **[326 IAC 2-7-6]**

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** within one (1) hour upon verbal request of an IDEM, OAM representative, ~~for a minimum of three (3) years. They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** providing they are made available within thirty (30) days after written request. **If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

- (4) ~~Records of any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to: work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance.~~

Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

47. Condition C.23 (General Reporting Requirements) has been changed to be as follows:

C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) **To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the permit requirements and the date(s) of each deviation must be reported.**
- ~~(a)~~(b) **The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:**
Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- ~~(b)~~(c) **Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be **considered** timely if ~~delivered by any method and received and stamped~~ the date postmarked on the envelope or certified mail receipt, or affixed by shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]**
- ~~(c)~~(d) **Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.**
- ~~(d)~~(e) **All instances of deviations from any requirements of this permit as described in Section B - Deviations from Permit Requirements Conditions must be clearly identified in such reports.**
- ~~(e)~~(f) **Any corrective actions or response steps taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions as a result of each deviation must be clearly identified in such reports.**
- ~~(f)~~(g) **The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.**

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

48. The equipment listed in Section D.1 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

Facility Description [326 IAC 2-7-5(15)]

- (1) **Three (3) ~~60-625~~ 68.75 million Btu per hour boilers, identified as Boiler 2, Boiler 3 and Boiler 4, using natural gas, No. 6 residual oil and No. 2 distillate oil, for fuel, with no control, and Boiler 2 exhausting to stack 79 and Boilers 3 and 4 exhausting to stack 80.**

49. Condition D.1.4 (now renumbered D.1.3) (Testing Requirements) has been changed to be as follows:

D.1.43 Testing Requirements [326 IAC 2-7-6(1),(6)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-7-6(1). Compliance stack tests shall be performed within 180 days of issuance of this permit, for PM from boilers 3 and 4 at stack 80. These test shall be performed according to Section C - Performance Testing, using 40 CFR 60, Appendix A, Methods 5 or 17 (as appropriate) or other methods approved by OAM. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

50. Condition D.1.5 (now renumbered Condition D.1.4) (Sulfur Dioxide Emissions and Sulfur Content) has been changed to be as follows:

D.1.54 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to ~~326 IAC 3-3-4~~ **326 IAC 3-7-4**, the Permittee shall demonstrate that the sulfur content does not exceed 1.52 percent by weight **for No. 6 fuel oil and 0.5 percent by weight for No. 2 fuel oil** by:
- (1) Providing vendor analysis of fuel delivered, if accompanied by a certification;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the ~~thirteen (13) three (3) 68.75 MMBtu per hour heater boilers~~, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in ~~326 IAC 3-2-4~~ **326 IAC 3-6**.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

51. Condition D.1.6(a) (now renumbered Condition D.1.5(a)) (Visible Emissions Notations) has been changed to be as follows:

- (a) Daily visible emission notations of the boiler stack exhausts shall be performed during normal daylight operations when any boiler is combusting No. 6 **or No. 2 fuel oil when exhausting to the atmosphere**. A trained employee will record whether emissions are normal or abnormal.

52. Condition D.1.7(a) (now renumbered D.1.6(a)) has been changed to be as follows:

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below.
- (1) Calendar dates covered in the compliance determination period;
 - (2) Actual **fuel oil** usage since last compliance determination period and ~~value calculated per limitation~~ **equivalent sulfur dioxide emissions**;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications.
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

53. The equipment listed in Section D.3 (now renumbered Section D.2) "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

Facility Description [326 IAC 2-7-5(15)]

- (2) One (1) Diesel fueled internal combustion engine-driven test cell, with a capacity of 400 Horsepower, identified as Dynos-2, and exhausting to stack 192.

54. Conditions D.3.3 (now renumbered Condition D.2.3), D.4.2 (now renumbered Condition D.3.2), and D.5.2 (now renumbered Condition D.4.2) (Testing Requirements) have been changed to be as follows:

D.32.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test this facility is not specifically required by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the NOx limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-7-6(1).~~

D.43.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test this facility is not specifically required by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing. this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-7-6(1).~~

D.54.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test this facility is not specifically required by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-7-6(1).~~

55. Condition D.3.4(a) (now renumbered Condition D.2.4(a)) (Visible Emissions Notations) has been changed to be as follows:

- (a) Weekly visible emission notations of the Dynos-2 stack exhaust shall be performed during normal daylight operations **when exhausting to the atmosphere**. A trained employee shall record whether emissions are normal or abnormal.

56. The equipment listed in Section D.3 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

Facility Description [326 IAC 2-7-5(15)]

- (3) Three (3) gasoline fueled internal combustion engine-driven test cells, with a combined capacity of 963 Horsepower, identified together as Dynos-1, and exhausting to stacks 194 and 202.

57. Condition D.4.3(a) (now renumbered Condition D.3.3(a)) (Visible Emissions Notations) has been changed to be as follows:

- (a) Weekly visible emission notations of the Dynos-1 stack exhausts shall be performed during normal daylight operations **when exhausting to the atmosphere**. A trained employee shall record whether emissions are normal or abnormal.

58. The equipment listed in Section D.5 (now renumbered as Section D.4) "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

Facility Description [326 IAC 2-7-5(15)]

Insignificant Activities:

- (1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

59. The Certification Form and the Natural Gas Certification Form have been replaced with revised Certification and Natural Gas Certification Forms (state form numbers have been removed).

60. The Deviation Occurrence Forms have been replaced with the Emergency/Deviation Occurrence Form.

61. A Quarterly Compliance Monitoring Report Form has been added.

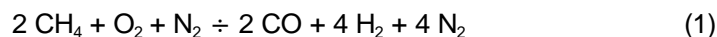
62. The Table of Contents has been updated to reflect the above mentioned changes.

Calculations

The following information was taken from the application submitted by Borg Warner and details the emissions from the processing of natural gas into endo gas, by the endo gas generators at the source:

Carbon Monoxide Emissions from Heat Treating Atmosphere

The reaction generating endothermic gas is:



The 5 endo gas generators at the site consume a total of 5.49 MCF of natural gas per hour (to produce endo gas). Since, as seen in equation 1, the reactio is equimolar with respect to CH_4 (natural gas) and CO, 5.49 MCF of CO are generated per hour. Equation 1 also shows that the generators peroduce a total of 27.45 MCF per hour of the mixed atmosphere gas - 10 moles of product/2moles of CH_4 x 5.49 MCF/hr.

From engineering data provided by Liquid Carbonic Corp., the specific volume of CO is 0.0138 MCF/lb at standard conditions.

According to heat treating furnace suppliers, the flare at the furnace outlet destroys 99% fo the CO gas. According to NFPA 325M-1984, the autoignition temperature of CO is 1128EF and the upper flammable limit is 74%. Given the elevated temperature and CO-rich mixture, combustion is unavoidable and the outlet flare is not an air pollution control device.

On the basis of these conditions, the site specific emission factor is:

$$\frac{0.2 \text{ MCF CO}}{\text{MCF atm}} \times \frac{1 \text{ lb CO}}{0.0138 \text{ MCF CO}} \times \frac{0.01 \text{ lb CO emission}}{\text{lb CO}} = \frac{0.145 \text{ lb CO emission}}{\text{MCF atm}}$$

Appendix A: Emission Calculations**Natural Gas Combustion Only****MM Btu/hr 0.3 - < 10****Heat Treat Units****Company Name: Borg Warner Automotive Diversified Transimission Products Corp.****Address City IN Zip: 5401 Kilgore Ave., Muncie, Indiana 47302****T: 035-7410****Plt ID: 00020****Reviewer: Dana L. Brown****Date: June 18, 1997**Heat Input Capacity
MMBtu/hrPotential Throughput
MMCF/yr

40.9

357.9

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	2.1	2.1	0.1	17.9	0.9	3.8

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton